

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

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DEBORAH CHIN, individually and on )  
behalf of all others similarly situated, )

Plaintiff, )

v. )

Civil Action No. 1:04-CV-10294 (DPW)

SONUS NETWORKS, INC., HASSAN )  
AHMED, and STEPHEN NILL, )

Defendants. )

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MICHELLE TREBITSCH, on behalf of )  
herself and all others similarly situated, )

Plaintiff, )

v. )

Civil Action No. 1:04-CV-10307 (DPW)

SONUS NETWORKS, INC., HASSAN M. )  
AHMED, and STEPHEN J. NILL, )

Defendants. )

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[Captions continued on next page]

**NOTICE OF MOTION TO CONSOLIDATE ACTIONS,  
TO BE APPOINTED LEAD PLAINTIFFS AND FOR APPROVAL OF LEAD  
PLAINTIFFS' SELECTION OF LEAD COUNSEL AND LIAISON COUNSEL**

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INFORMATION DYNAMICS LLC, on )  
behalf of itself and all others similarly )  
situated, )

Plaintiff, )

v. )

SONUS NETWORKS, INC., PAUL R. )  
JONES, EDWARD N. HARRIS, J. )  
MICHAEL O'HARA, HASSAN M. )  
AHMED, and STEPHEN J. NILL, )

Defendants. )

Civil Action No. 1:04-CV-10308 (DPW)

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PETER KALTMAN, on behalf of himself )  
and all others similarly situated, )

Plaintiff, )

v. )

SONUS NETWORKS, INC., RUBIN )  
GRUBER, HASSAN AHMED, and )  
STEPHEN NILL, )

Defendants. )

Civil Action No. 1:04-CV-10309 (DPW)

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SAMANTHA DEN, individually and on )  
behalf of all others similarly situated, )

Plaintiff, )

v. )

SONUS NETWORKS, INC., HASSAN M. )  
AHMED, and STEPHEN J. NILL, )

Defendants. )

Civil Action No. 1:04-CV-10310 (DPW)

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[Captions continued on next page]

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RICHARD CURTIS, individually and on )  
behalf of all others similarly situated, )

Plaintiff, )

v. )

SONUS NETWORKS, INC., HASSAN M. )  
AHMED, and STEPHEN J. NILL, )

Defendants. )

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Civil Action No. 1:04-CV-10314 (MLW)

RONALD KASSOVER, on behalf of the )  
Ronald Kassover IRA and on behalf of all )  
others similarly situated, )

Plaintiff, )

v. )

SONUS NETWORKS, INC., HASSAN M. )  
AHMED, and STEPHEN J. NILL, )

Defendants. )

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Civil Action No. 1:04-CV-10329 (DPW)

STEVE L. BAKER, individually and on )  
behalf of all others similarly situated, )

Plaintiff, )

v. )

SONUS NETWORKS, INC., HASSAN )  
AHMED, and STEPHEN NILL, )

Defendants. )

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Civil Action No. 1:04-CV-10333 (DPW)

[Captions continued on next page]

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MICHAEL KAFFEE, individually and on )  
behalf of all others similarly situated, )

Plaintiff, )

v. )

SONUS NETWORKS, INC., HASSAN )  
AHMED, and STEPHEN NILL, )

Defendants. )

Civil Action No. 1:04-CV-10345 (DPW)

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HAIMING HU, individually and on behalf )  
of all others similarly situated, )

Plaintiff, )

v. )

SONUS NETWORKS, INC., HASSAN )  
AHMED, and STEPHEN NILL, )

Defendants. )

Civil Action No. 1:04-CV-10346 (DPW)

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CHARLES STARBUCK, individually and )  
on behalf of all others similarly situated, )

Plaintiff, )

v. )

SONUS NETWORKS, INC., HASSAN )  
AHMED, and STEPHEN NILL, )

Defendants. )

Civil Action No. 1:04-CV-10362 (DPW)

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SANUEL HO, individually and on behalf )  
of all others similarly situated, )  
) )  
Plaintiff, )  
) )  
v. )  
) )  
SONUS NETWORKS, INC., HASSAN )  
AHMED, and STEPHEN NILL, )  
) )  
Defendants. )

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Civil Action No. 1:04-CV-10363 (DPW)

JEFFREY C. RODRIGUES, individually )  
and on behalf of all others similarly )  
situated, )  
) )  
Plaintiff, )  
) )  
v. )  
) )  
SONUS NETWORKS, INC., HASSAN M. )  
AHMED, and STEPHEN J. NILL, )  
) )  
Defendants. )

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Civil Action No. 1:04-CV-10364 (DPW)

ROBERT CONTE and MARK RESPLER, )  
individually and on behalf of all others )  
similarly situated, )  
) )  
Plaintiff, )  
) )  
v. )  
) )  
SONUS NETWORKS, INC., HASSAN )  
AHMED, and STEPHEN NILL, )  
) )  
Defendants. )

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Civil Action No. 1:04-CV-10382 (DPW)

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WHEATON ELECTRICAL SERVICES )  
RETIREMENT 401K PROFIT SHARING )  
PLAN, on behalf of itself and all others )  
similarly situated, )

Plaintiff, )

v. )

SONUS NETWORKS, INC., HASSAN )  
AHMED, and STEPHEN NILL, )

Defendants. )

Civil Action No. 1:04-CV-10383 (DPW)

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BRIAN CLARK, individually and on )  
behalf of all others similarly situated, )

Plaintiff, )

v. )

SONUS NETWORKS, INC., PAUL R. )  
JONES, EDWARD N. HARRIS, J. )  
MICHAEL O'HARA, HASSAN M. )  
AHMED, and STEPHEN J. NILL, )

Defendants. )

Civil Action No. 1:04-CV-10454 (DPW)

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SHEILA BROWNWELL, individually and )  
on behalf of all others similarly situated, )

Plaintiff, )

v. )

SONUS NETWORKS, INC., HASSAN )  
AHMED, and STEPHEN NILL, )

Defendants. )

Civil Action No. 1:04-CV-10597 (DPW)

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SAVERIO PUGLIESE, on behalf of )  
himself and all others similarly situated, )

Plaintiff, )

v. )

SONUS NETWORKS, INC., HASSAN M. )  
AHMED, and STEPHEN J. NILL, )

Defendants. )

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Civil Action No. 1:04-CV-10612 (DPW)

DAVID V. NOCITO, individually and on )  
behalf of all others similarly situated, )

Plaintiff, )

v. )

SONUS NETWORKS, INC., HASSAN M. )  
AHMED, and STEPHEN J. NILL, )

Defendants. )

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Civil Action No. 1:04-CV-10623 (DPW)

JONATHAN A. ZALAUF, individually )  
and on behalf of all others similarly )  
situated, )

Plaintiff, )

v. )

SONUS NETWORKS, INC., HASSAN )  
AHMED, Ph.D., and STEPHEN NILL, )

Defendants. )

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Civil Action No. 1:04-CV-10714 (DPW)

PLEASE TAKE NOTICE that class members Nakid M. Farhat, Kenneth W. McGaha, John Haggins and Patrick Fung (collectively, the “Farhat Plaintiff Group”), by their counsel, will hereby move this Court, on a date and at such time as may be designated by the Court, for an Order (attached hereto as Exhibit A): (i) appointing the Farhat Plaintiff Group as lead plaintiffs; (ii) approving the Farhat Plaintiff Group’s selection of the law firms of Schiffrin & Barroway, LLP and Goodkind Labaton Rudoff & Sucharow, LLP to serve as lead counsel; (iii) approving the Farhat Plaintiff Group’s selection of the law firm of Shapiro Haber & Urmey, LLP to serve as liaison counsel; and (iv) granting such other and further relief as the Court may deem just and proper. In support of this motion, the Farhat Plaintiff Group submits herewith a memorandum of law and declaration of Darren J. Check.

Dated: April 12, 2004.

Respectfully submitted,

**SHAPIRO HABER & URMEY, LLP**

**/s/Theodore M. Hes-Mahan**

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**Proposed Lead Counsel**